

**Final Program Timberland Environmental  
Impact Report**

for the  
**Meadow Vista Vegetation Management Project**

**Lead Agency**

California Department of Forestry and Fire Protection  
The Resources Building  
1416 Ninth Street  
Sacramento, CA 95814

**Prepared by:**

Placer County Resource Conservation District  
251 Auburn Ravine Road, Suite 201  
Auburn, CA 95603

**February 18, 2000**

## **Table of Contents**

1.	Introduction and Purpose .....	1
2.	Summary .....	1
3.	Substantive Changes to Draft Program Timberland Environmental Impact Report (June 3, 1999) .....	13
4.	Written Comments and Responses .....	14
	Attachment "A" - Comment Letters and 7/8/99 Public Hearing Notes at Sierra Hills School at Meadow Vista	
	Attachment "B" – Final Meadow Vista PTERI/PTHP Checklist	

**FINAL PROGRAM TIMBERLAND ENVIRONMENTAL IMPACT REPORT (PTEIR)  
Meadow Vista Vegetation Management Project**

**1. INTRODUCTION AND PURPOSE**

The Final PTEIR provides the lead agency, the California Department of Forestry and Fire Protection (CDF), an opportunity to respond to comments received on the Draft PTEIR and to incorporate any changes or additions necessary to clarify and/or supplement the information contained in the document. The Final PTEIR, therefore, represents the culmination of all environmentally related issues raised during the comment period on the Draft PTEIR for the Meadow Vista Vegetation Management Project.

This summary document, its indicated changes to the Draft PTEIR [see section 3, **"Substantive Changes to Draft Program Timberland Environmental Impact Report (June 3, 1999),"** which presents the changes that have been made to the Draft PTEIR in the preparation of the Final PTEIR], and the Draft PTEIR (as amended by the latter changes), constitute the Final PTEIR. The Draft PTEIR document of June 3, 1999, is incorporated by reference into the Final PTEIR.

This document has been prepared by the Placer County Resource Conservation District (RCD) to address comments received regarding the Draft PTEIR prepared for the Meadow Vista Vegetation Management Project. The 45-day public review period for the Draft PTEIR was June 15 through July 30, 1999. A copy of the Draft PTEIR and other relevant documents can be obtained from the Placer County RCD, 251 Auburn Ravine Road, Suite 201, Auburn, CA 95603.

**2. SUMMARY**

For each impact section, a summary description from the Draft EIR is provided with applicable mitigation measures.

**2.1 PROJECT DESCRIPTION**

In 1996, the Placer County Board of Supervisors adopted the Meadow Vista Community Plan to establish a policy framework for long-term community growth including policies to reduce wildland fire hazard through fuel reduction measures. Prominent policy direction is a desire to perpetuate the existing forested condition while recognizing that the area has significant fire dangers that must be addressed.

The purpose of the Meadow Vista Vegetation Management Project is to facilitate the implementation of a system of shaded fuelbreaks, defensible space, and

defensible landscape practices in keeping with objectives of the Meadow Vista Community Plan utilizing the Program Timberland Environmental Impact Report (PTEIR) process as adopted by the California Board of Forestry. The PTEIR is tiered to the Meadow Vista Community Plan Final EIR which is incorporated by reference. The PTEIR is also consistent with the California Fire Plan prepared by the State Board of Forestry and implemented by the Nevada-Yuba-Placer Ranger Unit of the California Department of Forestry and Fire Protection.

Managing vegetation in accordance with this PTEIR may involve to some degree the commercial harvesting of trees, whether to remove dead or dying trees, trees posing a fire hazard, or those suffering from insect/disease problems. The California Department of Forestry and Fire Protection (CDF) regulates commercial timber harvesting on private lands in California as well as providing rural fire protection and enforcing defensible space vegetation standards around buildings.

The PTEIR also discusses the potential impacts of the "Proposition 204 Coordinated American River Watershed Health Improvement and Monitoring Project" in the Meadow Vista area. This \$1,000,000 grant given to the American River Watershed Group will be used to inspect residences for defensible space and to provide roadside chipper services to chip vegetation removed to reduce fire hazards (note: chipper services will not be provided to process vegetation generated during commercial timber harvest activities). The impacts of the latter program are closely related to those that would result from the overall vegetation management program proposed in the PTEIR.

Mitigation measures in this document are based on current standard State forest practice rules and new measures with higher standards developed specifically for the Meadow Vista area.

## **2.2 LAND USE AND PLANNING**

The Meadow Vista Community Plan (MVCP) contains several policies that relate to and support vegetation management. The Vegetation Management Project is an implementation strategy for community plan policy. Without the Vegetation Management Project, fuel load reduction in the form of shaded fuelbreaks, defensible space, and defensible landscape practices will still occur but at a slower rate. The Meadow Vista Vegetation Management Project is consistent with existing county and community plans. No impact to land use planning policy is anticipated.

## **2.3 GEOLOGY AND SOILS**

Implementation of the project would result in increased short- and long-term

erosion from activities. This impact is considered significant because these activities would result in disruptions, displacements, compaction, or overcovering of the soil and would increase water erosion of soils on the site.

### **Mitigation**

1. Develop a slope map for the PTHP project site or have project maps on current USGS topographic map base.
2. Install waterbars on all exposed soil, heavy equipment trails, and roads no further apart than the Forest Practice Rules Moderate Erosion Hazard rating distance.
3. Restrict timber operations to those areas with low or moderate Erosion Hazard Ratings (EHRs) with slopes less than or equal to 50%. Prohibit timber operations on areas of high or extreme EHR or on slopes over 50%.
4. Require re-stocking in conformance with recommendations of the Registered Professional Forester (RPF) as contained in the PTHP.
5. Require that a minimum of existing organic matter be left on site to reduce energy of rainfall and lower potential erosion. Also, in areas of defensible landscape, lop and/or crush slash and leave it on the ground to further reduce the impact of rain on bare soil.
6. Lop all slash to less than 20 inches above ground, except in areas where higher standards apply (within 100 feet of residences).
7. Prohibit use of heavy equipment within any Watercourse and Lake Protection Zone (WLPZ) except at existing road crossings, thus protecting existing watercourses.
8. Allow only alternatives to WLPZ protection measures that increase the WLPZ width or restrictions within the zone. No decreased restrictions will be allowed.
9. Avoid heavy equipment use on saturated or near-saturated soils.
10. Restrict vegetation removal on landslide-prone areas.
11. Conduct mechanical treatments along contours on areas of moderate to high erosion hazard ratings.

12. New road construction shall be less than 100 feet in length, be on average slopes of less than 20%, involve no substantial cuts and/or fills, and may not occur in any Watercourse and Lake Protection Zone (WLPZ).
13. Allow only in-lieu winter operating plans that do not allow operations in WLPZ or on unstable ground.

### **Level of Significance Following Mitigation**

With implementation of the recommended mitigation measures, impacts to geology and soils will be mitigated to a less than significant level.

## **2.4 HYDROLOGY AND WATER QUALITY**

Changes in interception and infiltration rates with vegetation removal and the construction of tractor roads associated with the proposed project could contribute to existing flooding problems in Wooley Creek and along the Bear River. Use of heavy equipment, slash, and yarding could result in a possible decrease in water quality in the canals and reservoirs in the Plan area.

Vegetation management activities could result in possible short-term and long-term water quality degradation of streams. In addition to sedimentation impacts, use of heavy equipment presents the potential for accidental spills of pollutants such as gasoline, oil, and diesel fuel.

### **Mitigation**

(See also mitigation measures for Geology and Soils)

1. Establish watercourse and lake protection buffer zones along perennial watercourses in which vegetation removal, fuel reduction, and ground disturbance are limited. The width of the buffer zone is dependent on the adjacent hillside slope and watercourse class as shown below:

<u>Watercourse Class</u>			
<u>Hillside Slope</u>	<u>Fish Bearing</u> I	<u>Non-Fish Bearing</u> II	<u>Intermittent</u> III
0-30%	75 feet	50 feet	25 feet
30-50%	100 feet	75 feet	50 feet
50% >	150 feet	100 feet	50 feet

2. Prohibit heavy equipment from streamside buffer zones except at designated crossings.
3. Restrict new road construction to less than 100 feet in length with no construction within any watercourse buffer zone.
4. Prohibit clearcut and group selection harvesting.

### **Level of Significance Following Recommended Mitigation**

With implementation of recommended mitigation measures, potential impacts to hydrology and water quality will be reduced to a less than significant level.

## **2.5 VISUAL RESOURCES**

Implementation of the Meadow Vista Vegetation Management Project would result in a change in the visual character of the area through a reduction in the visual quality of the rural residential viewshed. The intent of the PTEIR is to maintain the existing forested condition of the Meadow Vista area while managing the vegetation for wildland fire protection.

Each one of these objectives means reducing the total amount of vegetation in the area, and spacing out remaining vegetation. Overall, the visual impact will be to keep the same basic forest types, only with a more open appearance.

### **Mitigation**

1. Restrict allowable silvicultural harvest methods to only those that maintain at least a minimum amount of mature overstory trees.
2. Leave a variety of size classes of vegetation (a) in shaded fuelbreak areas, while still providing an adequate disruption of fuel continuity for fuelbreak function and (b) in defensible landscape areas, while still providing an adequate disruption of fuel continuity for defensible landscape function.
3. Complete clean-up of slash and organic debris in defensible space and shaded fuelbreak areas. Clean up shall be by chipping, removing, or burning. Chipping shall occur no later than 45 days after the creation of the slash and debris. Piling for burning shall occur no later than 60 days after the creation of the slash or debris, with burning no later than April 1 of the year following creation or one year from the date of creation, whichever comes first. Removal shall occur no later than 60 days of the creation of the slash or debris. For clean-up

purposes, shaded fuelbreaks shall be 100 feet either side of centerline of designated roads.

### **Level of Significance**

Potential impacts to visual resources will be reduced by limited silvicultural practices proposed for fuel reduction purposes. Vegetative screening can be accomplished by selective removal of brush and understory to ensure privacy. Selective removal and replanting of native or other species to maintain a desired level of screening will reduce impacts to a less than significant level.

## **2.6 BIOLOGICAL RESOURCES**

Individual Valley oaks could be removed to reduce fuel loading, as commercial hardwood, or indirectly as affected by soil disturbance and soil compaction. The extent of oak loss cannot be assessed at this time; however, future development in the Plan area could contribute incrementally to statewide loss of Valley Oaks in California. The loss of individual oaks could result in displacement or loss of wildlife species that depend on oaks for roosting, foraging, breeding, and movement corridors.

Although restricted activity is anticipated in riparian areas, limited vegetation trampling, streambank degradation, and disturbance to wildlife could occur.

The project could degrade wildlife habitat through fragmentation of continuous woodland and forest habitat, potentially disrupting linkages to other habitats, and lead to the direct and indirect loss or disturbance of special status plants and animals as well as native trees regulated under the Placer County Tree Preservation Ordinance. The California Wildlife Habitat Relationships (CWHR) model was used to estimate overall impacts to wildlife. The model runs indicate that while some species will experience a reduction in habitat, others will benefit from the Vegetation Management Project. The model runs also indicate that overall urbanization has a more significant impact on wildlife than does removal of vegetation for fuel reduction purposes.

### **Mitigation**

See also mitigation measures for Hydrology and Water Quality

1. Each proposed PTHP shall have proposed operating areas inspected by a qualified RPF or other qualified professional for the potential presence of any listed, threatened, or endangered species of plant or animal. No impacts to any listed species will be allowed.



2. Adjust the timing of vegetation management activities to avoid impacts on listed wildlife species, including actively nesting birds.
3. Avoid mechanical clearing in rare natural communities, including areas with special status plants.
4. Clean all equipment off-site to limit the spread of invasive plant species.
5. Encourage retention of Valley Oak areas within the community, and favor Valley Oak reproduction in those areas where it currently exists. Valley oak areas will be identified by individual landowners and retention will be encouraged.
6. Prohibit operations in any WLPZ except removal of dead/dying trees for public safety purposes and fire protection. All class I & II WLPZ watercourse corridors will otherwise remain intact.
7. Retain significant stand structure that will continue to be used for wildlife by restricting silvicultural harvest methods.

#### **Level of Significance Following Recommended Mitigation**

With implementation of recommended mitigation measures, potential impacts to biological resources will be reduced to a less than significant level.

### **2.7 CULTURAL RESOURCES**

Implementation of the Vegetation Management Project could result in the possible disturbance of documented or undocumented cultural resources (archaeological or historical resources).

#### **Mitigation**

1. Project areas will be surveyed by a qualified RPF or other qualified professional for potential archaeological and historical resources prior to project implementation.
2. No timber operations may occur on significant archaeological sites.
3. If an archaeological or historical site is discovered during vegetation management operations, work will immediately stop within 100 feet of the site and the CDF Director shall be notified. The significance of the resources shall

be determined and necessary protection measures taken. For significant cultural sites that cannot be avoided, site-specific mitigation measures must be approved by the CDF Director.

#### **Level of Significance Following Mitigation**

With implementation of proposed mitigation measures, potential impacts to cultural resources will be reduced to a less than significant level.

## **2.8 NOISE**

The proposed project has the potential to generate short-term noise from equipment used in the vegetative management process. This equipment includes chain saws, chippers, and other heavy equipment. Desirable outdoor levels of 60 dBA for residential uses and 45 dBA indoors could be exceeded during the course of vegetation management.

#### **Mitigation**

1. Restrict operation of chainsaws and other power-driven equipment to the hours between 7:00 a.m. and 9:00 p.m. The operation of all other power equipment, except highway vehicles, within 200 feet of an occupied dwelling shall be restricted to the hours between 7:00 a.m. and 9:00 p.m., and shall be prohibited on Sundays and nationally designated legal holidays.

#### **Level of Significance Following Mitigation**

Implementation of the recommended mitigation measure would reduce potential noise impacts to a less than significant level.

## **2.9 AIR QUALITY**

The major sources of air pollution are reactive organic gases (ROG) and oxides of nitrogen (NO<sub>x</sub>) emissions from heavy equipment exhaust and wind-blown dust from earth disturbance. In addition, disposal of wood/vegetative waste by open burning can create substantial emissions of PM<sub>10</sub> (particulate matter 10 microns or less in size), CO (carbon monoxide), NO<sub>x</sub>, ROG, and other compounds.

The PTEIR encourages projects to evaluate other vegetation disposal methods and use burning only where there is no other feasible alternative or if prohibiting burning would cause substantial financial hardship. Some non-PTHP vegetation management projects will be coordinated with a chipper program coordinated by CDF. This provision will reduce potential smoke emissions.

Vegetation management activities would result in potentially increased pollutant emissions from limited open burning. This impact would be considered potentially significant if open burning was not regulated by the Placer County APCD to minimize harmful conditions and nuisance effects.

### **Mitigation**

1. Evaluate alternative disposal methods to burning and use burning only where there is no other feasible alternative or if prohibiting burning would cause substantial financial hardship.
2. Burn only on designated burn-days stipulated by the Placer County Air Pollution Control District and with all necessary burn permits.
3. Reduce pre-burn fuel loading by using other treatments.
4. Require material to dry before piling or allow sufficient time after piling for material to dry before burning. Piles that contain little soil and are constructed to allow air movement will result in a burn that consumes significantly more debris and produces less smoke. More efficient burning and greater heat output will lift smoke higher, reducing smoke concentration near the ground.
5. Use mass-ignition techniques that produce a short duration fire thereby increasing combustion efficiency and flow of smoke into the convection column.
6. Prevent stumps from burning and smoldering.

### **Level of Significance Following Mitigation**

With burning restrictions contained within the PTEIR process, and with implementation of the recommended mitigation measures, impacts to air quality will be reduced to a less than significant level.

## **2.10 TRAFFIC AND CIRCULATION**

The impact to traffic flow as a result of vegetation management activities is limited to heavy equipment entering and exiting the road shoulder during fuel reduction activities. During such time, through traffic can be disrupted by heavy equipment operation, leading to delays and potential safety concerns. This impact is considered potentially significant as most major roads in the Plan area will have shaded fuelbreaks along their margins with associated work within the public right-of-

way.

### **Mitigation**

1. Provide measures such as flagmen and directional traffic control as determined by the Placer County Public Works Department when heavy equipment ingress and egress is required in the public right-of-way.
2. Retain encroachment permits as needed for work in the Caltrans or County right-of-way.

### **Level of Significance Following Mitigation**

Implementation of the proposed mitigation measures will reduce potential traffic impacts to a less than significant level.

## **2.11 FIRE PROTECTION**

Successful implementation of the Meadow Vista Vegetation Management Project would lead to favorable impacts on wildfire management and fire fighting agencies. In the long run, the project would make it safer to fight fires around houses, would slow down

the spread of fires between houses, and would lower overall fuel loads found in the forests of Meadow Vista.

Care must be taken, however, to reduce the threat of wildland fire by adequate clean-up following timber operations, including provisions for chipping, composting, or controlled burning of slash and debris.

The PTEIR program can only be effective if the public is informed of its benefits through an education program administered by fire agency personnel. The actual amount of increased demand cannot be determined because the levels of service will vary, depending on the commitment of fire service agencies.

### **Mitigation**

1. Lop all logging slash to less than 20 inches above ground, except in those areas where current rules require other treatment (within 100 feet of residences).
2. Require clean up and disposal of debris on the ground within shaded fuelbreak

projects to lower potential fire danger. Clean up shall be by chipping, removing, or burning. Chipping shall occur no later than 45 days after the creation of the slash and debris. Piling for burning shall occur no later than 60 days after the creation of the slash or debris, with burning no later than April 1 of the year following creation or one year from the date of creation, whichever comes first. Removal shall occur no later than 60 days of the creation of the slash or debris. For clean-up purposes, shaded fuelbreaks shall be 100 feet either side of centerline of designated roads.

3. Require clean up and disposal of all substantial size debris (greater than 1 inch) within defensible space harvests to lower potential fire danger.
4. Require rapid surface drying (spreading of material away from wet areas) for material left on the ground to prevent increase in insect brood material.

### **Level of Significance Following Mitigation**

Implementation of the proposed mitigation measures will reduce potential fire protection impacts to a less than significant level.

## **2.12 ALTERNATIVES TO THE PROPOSED PROJECT**

### **No Project Alternative**

Under the no project alternative, the PTEIR process would not be used to facilitate the implementation of vegetation management projects, including those proposed under the Proposition 204 project. Individual landowners could continue to clear vegetation for defensible space and defensible landscape purposes with little or no assistance or control from local or state agencies.

Burning of removed material would be permitted by the APCD on designated burn days. Shaded fuel breaks would be implemented by local and state agencies as well as private property owners on a voluntary basis and with funds as they become available. If commercial timber harvesting is proposed as part of the vegetation management process, then the existing timber harvest plan process on an individual basis would be pursued.

Existing regulations governing modified timber harvest plans could be used to implement some vegetation management objectives. The cost to individual landowners to use this process, however, will be higher than under the PTHP process due to Department of Fish and Game review fees and the need for detailed archaeological reports on all operating areas. The modified THP process has fewer environmental controls as a part of mandated conditions of approval and there are

fewer constraints on logging debris disposal methods in most situations. The modified THP system would only partially achieve goals of the PTHP process while not incorporating the necessary mitigation measures contained in the PTEIR.

Vegetation management and fuel load reduction would continue to occur, but at a slower rate than with the PTEIR alternative. The benefits of the application of Forest Practice Rules and mitigation measures within the PTEIR would not be achieved with continued private application of fuel reduction measures. Impacts to soils, water quality, vegetation, wildlife, and air quality would be greater with the no project alternative. This could be especially true if the continued build-up of fuel load lead or contributed to a catastrophic wildfire in the community.

Fuel loads would gradually build up throughout the Meadow Vista Community as general vegetation, timber volumes, and tree densities increase in the absence of harvesting and/or vegetation management. As a result, risks of damaging wildfires would increase relative to existing conditions. Because of the fuel management practices and standards specified in the PTEIR, the proposed project would not increase wildfire hazards relative to existing conditions and would reduce such hazards relative to the no project alternative.

### **Alternative 1 - PTEIR with Reduced Vegetation Management**

Under this alternative, instead of reducing vegetative ground cover by 40-60%, vegetative cover would be kept at 60-85% ground cover, through the restriction on types of silvicultural practices allowed within any PTHP. Because there would be less vegetation manipulation, there would be less impact to wildlife habitat, air quality, short-term noise and aesthetics.

Silvicultural practices from the Forest Practice Rules are defined in the *Introduction and Project Description*, including those to be applied in the various harvesting methods described in the PTEIR. Of the systems defined, only clearcutting and group selection are prohibited under the PTEIR system. Under the reduced vegetation management requirements, only alternative prescriptions would be allowed with provisions similar to the Sanitation/Salvage system. Under Sanitation/Salvage, only those trees that are dead, dying, or that have severe structural problems are removed. The Forest Practice Rules alternative prescription would allow a limited number of green trees to be removed.

For projects undertaking a PTHP under the PTEIR process, less vegetation would be removed than with other silvicultural practices. This could result in less land disturbance, fewer impacts to wildlife, reduced visual impacts, and reduced potential for air quality impacts. As greater restrictions are placed on the PTEIR process,

however, fewer property owners will choose this alternative and the potential effectiveness of mitigation measures in the PTEIR will be reduced.

In addition, reduced vegetation management practices inherent in this alternative would not meet the objective of the project, which is to reduce wildland fire hazards. In addition, this alternative would not meet many policy objectives of the Meadow Vista Community Plan to provide a fire safe community.

### **Environmentally Preferred Alternative**

The proposed PTEIR project is the environmentally preferred alternative. The no project alternative would not provide the incentives for vegetation management that the PTEIR project would, nor would environmental protection measures be assured with continued private property owner pursuit of fuel load reduction outside of the PTEIR process.

Alternative 1 - PTEIR with Reduced Vegetation Management Requirements, would reduce several potential significant effects of the project but would not meet the overall objectives of the project to reduce wildfire hazards. This could result in greater potential for a catastrophic wildfire in the Meadow Vista community and the resulting significant impacts to water quality, biological, visual, cultural and air quality resources.

### **3. SUBSTANTIVE CHANGES TO DRAFT PROGRAM TIMBERLAND ENVIRONMENTAL IMPACT REPORT (JUNE 3, 1999)**

Rather than preparing a complete final PTEIR document to replace the June 3, 1999, draft, we present here the items that should be changed in that draft.

**Draft PTEIR, discussion of Proposition 204 projects in the Meadow Vista Area:** Delete references to shaded fuel break construction under Proposition 204 projects. Proposition 204 supported projects in the Meadow Vista area will be limited to inspections for Fire Safe Clearance around structures (under Public Resources Code § 4291) and to provision of roadside chipper services to chip vegetation generated through fire hazard reduction (note: chipper services will not be provided to process vegetation generated during commercial timber harvest activities).

**Draft PTEIR p. v, Mitigation #4,** changed to read “Prohibit clearcut and group selection harvesting.”

**Draft PTEIR p. v, Mitigation #2**, changed to read “Leave a variety of size class vegetation (a) in shaded fuelbreak areas, while still providing an adequate disruption of fuel continuity for fuelbreak function and (b) in defensible landscape areas, while still providing an adequate disruption of fuel continuity for defensible landscape function.”

**Draft PTEIR p. ix**, add a new mitigation number 1, as follows, and renumber subsequent mitigations as numbers 2-6. “1. Evaluate alternative disposal methods to burning and use burning only where there is no other feasible alternative or if prohibiting burning would cause substantial financial hardship.”

**Draft PTEIR p. xiii**, last paragraph, change second sentence to read, “Of the systems defined, only clearcutting and group selection are prohibited under the PTEIR system.”

**Draft PTEIR p. 1-14**, change item 1 under Defensible Landscapes to read, “All harvest systems except clearcutting and group selection. When using other evenaged management prescriptions, there must remain at least eight 18-inch DBH or larger countable trees per acre.”

**Draft PTEIR p. 4-11, Mitigation #4**, changed to read “Prohibit clearcut and group selection harvesting.”

**Draft PTEIR p. 5-6, Mitigation #2**, changed to read “Leave a variety of size class vegetation (a) in shaded fuelbreak areas, while still providing an adequate disruption of fuel continuity for fuelbreak function and (b) in defensible landscape areas, while still providing an adequate disruption of fuel continuity for defensible landscape function.”

**Draft PTEIR p. 9-5**, add a new mitigation number 1, as follows, and renumber subsequent mitigations as numbers 2-6. 1. Evaluate alternative disposal methods to burning and use burning only where there is no other feasible alternative or if prohibiting burning would cause substantial financial hardship.

#### **4. WRITTEN COMMENTS AND RESPONSES**

Response letters were received from the following agencies and individuals:

- A. California Department of Fish and Game
- B. Placer County Planning Department
- C. Donna Ford



D. Patrice Taylor

Following are responses to comments. Comments are summarized and keyed to the comment letters attached as Attachment "A."

A. California Department of Fish and Game

**Comment 1:**

*Fish and wildlife mitigation measures are not sufficient to reduce potential cumulative impacts. To achieve adequate reduction, the project must: Identify and protect valley elderberry longhorn beetle.*

**Response:**

On page 6-11 of the PTEIR, under "Special Status Wildlife Species with Known or Potential Occurrence in the Meadow Vista Community Plan Area", the valley elderberry longhorn beetle is listed. Mitigation measure no. 1 on page 6-26 requires that all project areas be surveyed for the presence of any listed species, and no impacts to listed species are allowed to occur. This mitigation, and the subsequent monitoring program, will identify the potential presence of valley elderberry longhorn beetle and provide for protection.

**Comment 2:**

*No shrub removal should be allowed in WLPZs on perennial or intermediate watercourses. WLPZs should be 100 feet on perennial watercourses and 50 feet on intermediate ones.*

**Response:**

No timber operations are proposed in any WLPZ areas within Meadow Vista, except if a dead or dying tree is a public safety or fire protection hazard. In all cases, no heavy equipment will be operated within the zone (mitigation measure no. 6, page 6-27). No shrubs or green trees will be removed in these areas.

For the PTEIR/PTHP, WLPZs are a base 75 feet on either side of fish bearing watercourses in flat areas and up to 150 feet on steep areas. For intermediate watercourses, WLPZ ranges from 50 feet to 100 feet, depending on slope. These measures will adequately protect all watercourses and adjacent riparian zones.

**Comment 3:**

*No snag should be removed in any WLPZ if it is not a hazard.*

**Response:**

As stated in response to DFG comment no. 2, above, no trees will be removed in any WLPZ, unless the tree is a public safety or fire hazard (mitigation measure no. 6, page 6-27).

**Comment 4:**

*A minimum of 40% of existing shrubs should be retained on parcels greater than five acres.*

**Response:**

Shrub removal on any size parcel will be a function of what fuel load reduction would best achieve objectives and comply with mitigation measures of the vegetation management project, spatial arrangement and health of existing vegetation, and landowner direction. To set an absolute standard of 40% retention of shrubs may not allow achievement of these goals.

**B. Placer County Planning Department**

**Comment 1:**

*How can abuses of the process be prevented when someone wants to harvest trees only for the commercial value.*

**Response:**

The PTEIR is designed to prevent the two kinds of abuse that landowners could potentially attempt to carry out under the PTEIR: (1) harvesting commercial timber without achieving the PTEIR's fire hazard reduction goal or (2) harvesting far more trees

than is needed to reduce fuel hazards to an acceptable level. The first form of potential abuse is prevented by the PTEIR's express goal of reducing fire hazard. This goal is incorporated into item I(e) in the PTEIR/PTHP checklist, which asks, "Will an adequate amount and type of vegetation be removed to achieve effective fire reduction goals?" PTHPs that would not result in effective reduction of fire hazard or would increase fire hazard will not be approved by CDF.

With respect to the second potential form of abuse of the PTEIR, commercial harvest of far more trees than needed to effectively reduce fire hazard is limited by the harvesting restrictions incorporated in the PTEIR. The PTEIR allows less timber removal than could occur under a standard THP or a Modified THP. The harvesting restrictions include limiting defensible space and shaded fuel break treatments to the fuelbreak/defensible space harvest prescription of the Forest Practice Rules (see Draft PTEIR, p. 1-8 to 1-14). This prescription stresses that trees and other vegetation and fuels are to be removed to reduce the potential for wildfires; i.e., commercial tree removal is not the primary goal of this prescription. While the PTEIR's defensible space prescription may be applied to a distance up to 200 feet from a structure, just as does the Forest Practice Rules' fuelbreak/defensible space prescription, the PTEIR further restricts this distance to only the amount necessary to provide an adequate level of defensible space to the structure (see Draft PTEIR, p. 1-8).

The defensible landscape prescription limits the amount of commercial harvest that can occur through its primary goal of reducing the fuel loading, fuel continuity, and impaired forest health of dense, crowded, forest stands. This limitation is achieved, in part, by limiting the Forest Practice Rule harvest prescriptions that can be applied (clearcutting and group selection are prohibited), requiring the retention of twice the number of leave trees as required in the Forest Practice Rules for seed tree step or similar alternative prescriptions, and by requiring that, when any other evenaged prescriptions are applied, at least 8 18-inch diameter-breast-height or larger trees must be retained per acre.

In summary, should the property owner desire to harvest trees for commercial value under the PTEIR/PTHP process, the harvesting must achieve overall fuel reduction and fire protection objectives of the vegetation management project as outlined in the PTEIR. If a proposed fuel reduction project does not achieve these objectives, including compliance with PTEIR's specific timber harvest prescriptions, mitigations, and monitoring program, then CDF will not approve the PTHP and the commercial harvest of trees cannot take place.

**Comment 2:**

*Will the vegetation management project supersede local land use ordinances, such as allowing commercial logging operations in a zone district that does not otherwise*

*permit Forestry uses?*

**Response:**

The vegetation management project is intended to be consistent with planning and zoning laws and it is noted that tree harvesting, as opposed to commercial logging operations, is not prohibited in any zone district in Placer County. As there is no TPZ zoning in Meadow Vista, it is doubtful that any parcel is dedicated to the exclusive growing of commercial timber products. As stated in the response to comment no. 1, above, any trees harvested for commercial value under the PTEIR/PTHP process must have fuel reduction for fire protection as the primary objective.

**Comment 3:**

*Is expenditure of the Proposition 204 implementation money contingent upon the adoption of the PTEIR?*

**Response:**

The Proposition 204 contract requires environmental documentation satisfactory to the State Water Resources Control Board prior to project implementation. This affects each contract entity whether they are federal, state, or local agencies. CDF may use the PTEIR as part of their environmental documentation requirement for Proposition 204 projects in the Meadow Vista area. The balance of the larger Proposition 204 program for CDF, the United States Forest Service, and the Natural Resources Conservation Service, however, must undergo separate environmental documentation.

**Comment 4:**

*Will individual slope maps for projects be prepared?*

**Response:**

Current forest practice regulations do not require individual slope maps for each timber harvest plan. A 7.5' USGS topographic map base, with field checking and refinement by the Registered Professional Forester, is generally adequate for the desired level of information in a PTHP. Mitigation measure no. 1 on page 3-10, however, provides for preparation of an individual slope map if appropriate.

**Comment 5:**

*High erosion hazard occurs on slopes that are much less than 50%. Should not more conservation standards be used in implementing the program?*

**Response:**

The primary criterion for determining the appropriateness of fuel reduction operations is not slope, but rather the erosion hazard rating (EHR) of the soil. Mitigation measure no. 3 on page 3-10 restricts timber operations to those areas with low or moderate EHR. Timber operations on soils with high or extreme EHR or on slopes greater than 50% are prohibited.

**Comment 6:**

*The PTEIR should include specific examples, formulas and strategies for preserving visual privacy. Visual resource impacts should be listed as "Significant and unmitigated" due to lack of prescriptions that will guarantee visual privacy and protect scenic vistas.*

**Response:**

Proposed projects subject to the PTEIR\PTHP process will impact the density of vegetation. However, specific mitigation measures prevent removal of a significant amount of vegetation (mitigation measure no. 1, page 5-6), require that a variety of size class vegetation be retained (mitigation measure no. 2), and require specific clean-up standards (mitigation measure no. 3). It is anticipated that these measures will perpetuate the forested areas of Meadow Vista in a scenic condition, while at the same time providing greater fire protection. Any proposed project subject to the PTEIR and its monitoring program that does not conform with these measures will be denied by CDF. The PTEIR mitigation measures and monitoring program requires the Registered Professional Forester to consider aesthetic impacts when preparing a PTHP.

With regard to scenic resources, specifically screening and scenic vistas, the Meadow Vista Community Plan contains the following policies:

**1.K.1.** The County shall require that new development in scenic areas (e.g., river canyons, lake watersheds, scenic highway corridors, ridgelines, and steep slopes [especially Sugar Pine Mountain]) is planned and designed in a manner which employs design, construction, and maintenance techniques that:

b. Incorporate design and screening measures which utilize natural landforms

and vegetation for screening structures, access roads, building foundations, and cut-and-fill slopes *consistent with the needs of the State Fire Plan and Fire District Defensible Space programs.* (emphasis added)

**1.K.8.** The County shall balance the desire to maintain heavily vegetated corridors along circulation routes to preserve their rural nature and perceived values as natural noise buffers *with the need to reduce fuel loads (both the volume and density of flammable vegetation) along fire escape routes to increase safety for emergency fire equipment and evacuating civilians, to provide a point of attack or defense from a wildfire, and as fuel or fire breaks.* (emphasis added)

The Final EIR for the Meadow Vista Community Plan found that adoption of these policies would reduce potential visual impacts to a less than significant level. Additional mitigation in the PTEIR is consistent with and provides implementation for these policies. In that the project is consistent with the Meadow Vista Community Plan and is tiered to the Plan EIR, there is no evidence to suggest that the additional mitigation measures contained in the PTEIR will not reduce potential aesthetic impacts to a less than significant level.

**Comment 7:**

*Burning should be eliminated as an option for slash disposal.*

**Response:**

Burning of slash and debris will be strictly controlled when undertaken within the PTEIR process. Burning will be allowed only if other methods of disposal are unavailable or prove infeasible, or when denial of burning would pose a risk of imminent and substantial economic loss (Draft PTEIR, page 1-15). Any limited burning that does take place would be in compliance with burn regulations established by the Placer County APCD, and under permit from CDF, if applicable. Coordination with a chipper program is also required. These restrictions, combined with current regulations of the air pollution control district to manage the limited burning which may occur, will reduce air pollution impacts to a less than significant level. If in the future, burning of woody debris is not legally permitted in the air basin, then PTEIR/PTHP projects will be similarly restricted.

**Comment 8:**

*No heavy equipment should be allowed in steamside buffer zones.*

**Response:**

Mitigation measure no. 2 on page 4-11 of the PTEIR states, "Prohibit heavy equipment from streamside buffer zones except at designated crossings". This means that no heavy equipment can operate within any buffer zone (WLPZ) except at designated crossings where heavy equipment is passing over the watercourse. For example, a designated crossing would be the Placer Hills Road crossing of Woolley Creek and its associated buffer zone.

**Comment 9:**

*"Minimum amount" of retained trees should be higher for residential areas than for commercial timber growing areas.*

**Response:**

Page 1-14 of the PTEIR lists the silvicultural harvest systems allowed within the Meadow Vista area for PTEIR/PTHP projects. Clearcutting and group selection are not permitted harvest systems; when using other permitted systems, "at least twice the number of minimum leave trees specified in the Forest Practice Rules must be retained."

**Comment 10:**

*Native hardwood removal is not adequately addressed, particularly black oaks.*

**Response:**

As with all other vegetation in the Meadow Vista area, native oaks, including black oaks, could be removed to achieve the objectives of the vegetation management project.

Because California black oak is extremely common in Meadow Vista, and there is no potential to reduce this overall abundance, no specific discussion of black oak is included. Valley oak, due to its rarity in the area, and identified protection in the Meadow Vista Community Plan, is discussed and subject to specific mitigation (measure no. 5 on page 6-27 of the Draft PTEIR).

**Comment 11:**

*The PTEIR should address cumulative impacts of tree removal and urbanization.*

**Response:**

Cumulative impacts to biological resources resulting from combined fuel reduction and urbanization were analyzed utilizing the WHR computer runs, based on different acreage impacts of tree removal and/or urbanization. The discussion found in Chapter 6 of the PTEIR reflects the results of these different runs.

From a cumulative standpoint, urbanization overwhelms fuel reduction in terms of impacts to habitat, aesthetics, and other environmental characteristics. The Meadow Vista Community Plan would allow the construction of approximately 1,200 additional dwelling units to reach its holding capacity of 7,471 persons. Assuming 1/3 acre of disruption for each unit for the structure, outbuildings, driveways, and urban landscaping, up to 400 acres of habitat would be clearcut. It should also be remembered that urbanization itself creates the need for fuel reduction measures which otherwise would not be needed, including required clearance around structures and additional fuelbreaks.

**Comment 12:**

*The PTEIR should fully disclose assumptions and workings of the WHR model computer program. Do RPFs have the needed knowledge to identify all listed threatened or endangered species of plants and animals, and to protect them?*

**Response:**

Specifics of the WHR computer program are beyond the scope of the PTEIR. Development of the program was a multi-agency effort including CDF, the Forest Service, NRCS, and the Department of Fish and Game. It is the only wildlife computer run specific to California that can be used by wildlife biologists to assist them in making estimates of potential impacts of given projects. Placer County accepted and is using the WHR program for community plan update purposes. Persons wishing more specifics on the program should contact the California Department of Fish and Game in Sacramento, California.

Mitigation measure no. 1 on page 6-26 states, "a qualified RPF or other qualified professional...". An RPF (Registered Professional Forester) is mandated by the Forest Practice Rules to design and prepare a timber harvest plan or program timber harvest plan. The RPF is the only licensed natural resource professional in the state and is governed by the RPF Licensing Act. That act, which includes disciplinary measures, requires that an RPF provide only forestry services for which he/she is qualified. If the



RFP's level of expertise is surpassed, he/she is required to consult with other resource professionals who have the needed expertise.

If an RPF does not have the knowledge to fully identify a specific species, he/she is required to consult with an expert who has such qualifications. CDF, the agency responsible for enforcing provisions of the PTEIR/PTHP, will ensure that these provisions are implemented.

**Comment 12:**

*Impacts to Biological Resources should be "Significant and unmitigatable."*

**Response:**

Chapter 6 includes an analysis of potential impacts to biological resources, including runs of the California Wildlife Habitat Relationships model. Those runs and analysis by CDF biologists for the project conclude that overall habitat values remain constant or will be increased for 83% of the species potentially occurring in the Meadow Vista area. While habitat for 17% of species may decline, such decreases are not considered significant. When considering applicable forest practice rules and additional mitigation measures contained in the PTEIR, it is concluded that potential impacts to biological resources have been mitigated to levels less than significant. This finding is also consistent with conclusions of the Meadow Vista Community Plan Final EIR which found that impacts to biological resources as a result of implementing the Meadow Vista Community Plan are less than significant.

**Comment 13:**

*Because there may be an increase in smoke in the area due to burning, air resources impacts should be "Significant and unmitigatable."*

**Response:**

Due to restrictions on burning incorporated into the project, combined with coordination with a chipper program, the amount of burning will likely decrease as more private property owners utilize the PTEIR/PTHP process.

The project therefore has the potential to reduce the amount of burning compared to existing levels. Any limited burning which does occur would be only as legally permitted by regulations of the Placer County Air Pollution Control District.

**Comment 14:**

*The "PTEIR With Reduced Vegetation Management" alternative should be the preferred alternative because there are fewer impacts.*

**Response:**

The Reduced Vegetation Management alternative would reduce short- and mid-term impacts to wildlife, aesthetics, air quality, and other resources by reducing the amount of disturbance and vegetation removal. It is noted, however, that no impacts of the proposed vegetation management project were determined to be significant and unavoidable.

The reduced vegetation option was not chosen as the environmentally preferred alternative because it does not meet fire protection goals of the State Fire Plan. The reduced vegetation management alternative would not substantially reduce the potential for large fires nor protect the public health and safety of the people in Meadow Vista. While meeting objectives of the proposed project is ordinarily not a consideration in selecting the environmentally preferred alternative, it must be considered in this case. A catastrophic fire in the Meadow Vista Community would result in significant and unavoidable impacts to wildlife, air quality, visual resources, water quality, and the well being of residents.

**C. Donna Ford**

**Comment 1:**

*The project will result in a change to the visual character of area, in unknown amounts, with unacceptable results.*

**Response:**

See response to comment no. 6, page 19, from the Placer County Planning Department letter.

**Comment 2:**

*Stating that the commercial value of trees may be used to generate revenue is inappropriate in the PTEIR.*

**Response:**

The PTEIR/PTHP process is governed by the California Board of Forestry which is

empowered by the Z'berg-Nejedley Forest Practice Act to regulate commercial timber harvesting on private lands in California. The Board has no regulatory authority of non-commercial tree removals. Therefore, the only type of timber operations to which the PTEIR and future PTHPs apply are fuel reduction harvests where revenue is generated by the sale of timber products. Also see response to comment no. 1, page 16, from the Placer County Planning Department.

**Comment 3:**

*All species of pines, oaks, manzanita, buckeye and toyon should be encouraged to be retained.*

**Response:**

To achieve the specified fire protection goals contained in the vegetation management project, some vegetation will be removed for better spacing and clearance. The type of plant removed is dependent on the spatial arrangement, health, and size of existing vegetation on the parcel being proposed as a project under a PTHP. Pines, oaks, and manzanita are some of the most abundant species in the Meadow Vista area and some of these species will need to be removed. Depending on their location, size, and condition, buckeye and toyon plants may or may not be removed in any given operation.

**Comment 4:**

*The Reduced Vegetation Management Alternative should be the preferred alternative.*

**Response:**

See the response to comment no. 14, page 24, from the Placer County Planning Department letter.

**D. Patrice Taylor**

**Comment 1:**

*For this "volunteer" program to be successful, public understanding and awareness is critical. The July 8, 1999 public hearing on the Draft PTEIR was attended by just six people. It is indicative that the PTEIR still does not clarify, mitigate or resolve many issues as the "Public" in attendance still has concerns after the Draft PTEIR supposedly addressed their initial concerns made on the NOP.*

**Response:**

The Placer County Resource Conservation District (RCD), CDF, and the Placer Hills Fire District have made a distinct effort to publicize the PTEIR program. In addition to an initial scoping meeting, presentations have been made on the PTEIR at a Placer Hills Fire District public meeting and at public meetings of the Meadow Vista Municipal Advisory Council (MAC) where summaries of the document were provided.

At both the fire district and MAC meetings, the time, location, and purpose of the public hearing on the Draft PTEIR were discussed. Legal notices of the July 8, 1999 public hearing appeared in the Colfax Record and Auburn Journal as well as in the Sacramento Bee Neighbors section. A single page public notice was placed in the Meadow Vista post office, the fire district, and the RCD office. Copies of the PTEIR were made available at the fire district, RCD, and CDF offices. In addition, an informal public meeting was held on the PTEIR on June 21, 1999.

Responses to the May 12, 1998 NOP letter are contained in comments 8 through 29.

**Comment 2:**

*Why are fuel reduction projects being done before any monitoring or studies on water quality? What studies are going to be done in this area to justify the high cost of fuels treatment projects?*

**Response:**

Current State law mandates vegetation clearance around all structures in forested areas of the State. The current State Fire Plan has identified the need for pre-fire vegetation management projects to reduce the future cost and damage done by wildfires in the forested portion of the State. To implement these goals, the PTEIR is only one statewide program. Studies on water quality are not needed to implement programs to reduce potential fire dangers.

No studies are being planned at this time. The vegetation management project and participation by private landowners is voluntary and any costs of the PTHP and carrying out the field project are paid by the private landowner. The long-term benefits of the increased vegetation management and higher fire protection levels has been identified in the California Fire Plan as leading to lower future fire protection costs.

**Comment 3:**

*Need for pre- and post-treatment monitoring has not clearly been addressed.*

**Response:**

There is no requirement within the PTEIR/PTHP process for pre-treatment monitoring. The location of shaded fuel breaks and the need for clearance around structures, however, as identified in the State Fire Plan, are based on extensive field surveys and identification of fuel buildup in urbanized areas. Individual PTHPs will also identify the existing environment on the site with specific recommendations for fuel load reduction while protecting site resources. A system of post-treatment monitoring is contained in Chapter 13 of the PTEIR. The monitoring program will ensure that the mitigation measures contained in the PTEIR/PTHP have been properly implemented and allow for review of their effectiveness.

**Comment 4:**

*Will there be an increase in man/equipment fires, and what are the potential impacts to Fire Districts and homeowner's insurance rates.*

**Response:**

A small increase in accidental fires may occur with implementation of the PTEIR/PTHP process due to use of equipment that could cause fires (chain saws, etc.). All operations under an approved PTHP, however, must be carried out by a licensed timber operator and State Safety Codes and fire regulations will govern those operations. It is probable that professional operators will cause fewer accidental fires compared to individual homeowners undertaking brush removal. As for impacts to homeowner's insurance rates, it is hoped that insurance companies recognize areas where landowners have increased their fire protection through vegetation management and actually lower insurance rates.

**Comment 5:**

*Reductions in tree numbers with resulting reductions in carbon dioxide intake have impacts on air quality that are not mitigated.*

**Response:**

Air quality in the Meadow Vista area is influenced by many factors, the most important of which is the air pollutants that drift up from the more populated Sacramento Valley area. Removal of some vegetation may reduce the short term

carbon dioxide intake of plants, but in the long-term, will better protect the area from more dangerous pollutants caused by wildfires. With better spacing of vegetation leading to healthier individual plants, it is expected that each remaining tree will be more efficient in its utilization of atmospheric carbon dioxide resulting in little overall change in plant uptake of carbon dioxide in the area.

**Comment 6:**

*It is difficult to see that there can ever be an implementation of a fuel load reduction project that will not affect irreversibly the rural character -- habitat, biodiversity, air and water quality, scenic resources and viewscapes, etc.-- of Meadow Vista. Urbanization has been introduced slowly into this "interface" with the mixed oak and pine forest and wildlife to date have seemingly been able to adapt. Shelter, nesting, and food sources will be heavily impacted by the proposed vegetation management project, especially over its shorter time span if it is to be effective as a measure to reduce catastrophic fire.*

**Response:**

Chapter 6 of the PTEIR estimates the impact of the project on biological resources. The California Wildlife Habitat Relationships (CWHR) model runs compared current habitat values and the values that would occur if all landowners completed all projects. This approach constitutes an analysis of the extreme case which is unlikely to occur (not all landowners will participate, nor will all projects occur at once). Overall, the CWHR model run indicates the potential for reduction in habitat for 17% of the species which might occur in Meadow Vista with no habitat value change or habitat increases for 83% of the potential species in the area.

In a second run of the CWHR model, habitat was converted to urban use in keeping with projections from the Meadow Vista Community Plan. Consistent with the writer's experience, 123 species had an increase in habitat values and only one species shows a decrease in habitat value, indicating that many species such as deer, raccoon, and coyote can co-exist with urbanization. However, the conversion to urban use results in the complete loss of habitat for 47 species. This evaluation shows that impacts to existing vegetation and habitat from the vegetation management program will be much less than what will occur when development is built out in accordance with existing land use plans.

**Comment 7:**

*The Meadow Vista PTEIR should include picture ID's of wildlife species.*

**Response:**

This PTEIR is a disclosure document intended to describe the Meadow Vista Vegetation Management Project, how individual projects carried out under it would be conducted, and to disclose potential environmental impacts that might occur with its implementation. It is not intended to define and discuss individual life forms, habitats, and life cycles. There are many other books and manuals that achieve this purpose.

**Comment 8:**

*What is the mitigation monitoring program, and is it addressed in the PTEIR? Is a public hearing involved in the process of modifying mitigation measures contained in the Meadow Vista Community Plan Final PTEIR?*

**Response:**

The mitigation monitoring program is an important component of the Meadow Vista PTEIR and is contained in Chapter 13 of the document. It is a program to insure that the mitigation measures proposed to reduce potential adverse impacts of the project to less than significant levels are in fact carried out in the subsequent PTHP covering individual projects. The Draft PTEIR had a 45-day public comment period, which included a noticed public hearing on July 8, 1999. In order to modify any mitigation measures approved as part of the Final PTEIR, an environmental document would be prepared (such as a negative declaration or subsequent EIR) and the public would be provided an opportunity to review and comment on the proposed modifications.

**Comment 9:**

*Our experience within a 20 acre "neighborhood" that has undergone fuel reduction by various plans and means has given us a first hand look at the processes and the results. What are the possible mitigation measures to reduce the potential impacts to changes in water drainage and water quality?*

**Response:**

The fuel reduction programs mentioned were carried out by private property owners or federal cost-share programs. These programs were not implemented under the PTEIR/PTHP process nor subject to Forest Practice Rules or the mitigation measures and monitoring requirements of the PTEIR. Therefore, a comparison of the results may not be valid.

Mitigation measures in the PTEIR to reduce impacts to drainage and water quality

include: operations carried out under the PTEIR/PTHP process must not operate on unstable ground areas; new road construction may only be 100 feet long or less and may not contain any substantial cuts and/or fills; tractor skid trails will be kept to the minimum number to remove harvested trees; timber yarding operations will only occur during dry rainless periods; no heavy equipment operations will be allowed in watercourse and lake protection zones adjacent to creeks; and waterbars will be installed on all native soil skid trails to divert surface water so that it dissipates back into the ground.

**Comment 10:**

*There is a need to protect Sugar Pine Mountain.*

**Response:**

Open rocky areas with no or only sparse amounts of vegetation will not need to be treated, as they are not potential fire prone areas and already act as natural fuel breaks. Many areas adjacent to the mountain top and on the mountain itself, however, have dense vegetation similar to other areas of the Meadow Vista Community. Fuel reduction programs in these areas in keeping with the mitigation requirements of the PTEIR will benefit defensive fire protection efforts while protecting habitat and scenic resources.

**Comment 11:**

*An appropriate plan for "public awareness" and education is the shaded fuelbreak being created along Placer Hills Road near the I-80 interchange.*

**Response:**

Comments noted. The shaded fuelbreak at this location led to erosion problems. Mitigation measures within the PTEIR will provide for slope stabilization prior to the winter months.

**Comment 12:**

*What measures will be taken to monitor and correct run-off of pesticides, herbicides and fertilizers used to maintain and revegetate areas after treatment?*

**Response:**



Use of pesticides, herbicides and fertilizers are not proposed as part of the PTEIR. After fuel reduction treatment, raking of leaves, limbs and other plant debris, and pulling or moving resprouting vegetation will maintain the reduced fuel areas.

**Comment 13:**

*Will change in the quantity of ground water adversely affect local septic systems?*

**Response:**

The proposed projects will reduce, not eliminate, vegetation. Research indicates that when less than 20 percent of vegetation is removed there is no increase in ground water base flows and that the remaining vegetation takes up more water as it grows at an accelerated rate, due to less competition. Community-wide, vegetation removal will average far less than 20 percent. In addition, increases in development over time generally leads to increased surface runoff, less infiltration and lower ground water. As such, the net effect on septic systems will be less than significant.

**Comment 14:**

*Encouraging the use of mulches, naturally available and applied, and amending soils with moisture-holding compost should be used as a mitigation against increased watering of fire resistant plants. A bio-mass collection system should be set up and/or a composting operation should be set up.*

**Response:**

It is not anticipated that increased watering of residual vegetation will occur as a result of this project. Most of the areas to be managed are away from landscaped areas and not accessible to watering, nor would it be desirable to do so. Native vegetation is accustomed to growing in the climatic conditions that occur in the Meadow Vista area, and this includes no artificial watering. The first priority for disposal is chipping and spreading material back on the property. If economical, a bio-mass collection system could be set up sometime in the future by the County, but not as a direct result of this project.

**Comment 15:**

*What agency can anticipate and head off problems with disturbed soil areas being invaded by invasive plant species such as poison oak, annual European grasses and star thistle?*

**Response:**

The Placer County Agricultural Commissioner can give advice to individual landowners on how to treat undesirable plants. For most areas, maintenance mowing of any resprouting or invading vegetation will keep in check new growth.

**Comment 16:**

*What will filter and help purify air pollution caused by automobiles in the Meadow Vista area, particularly pollution drifting up from the Sacramento Valley?*

**Response:**

Living vegetation does help to filter out certain pollutants from the air through taking in of carbon dioxide and giving off oxygen and water. However, they also transpire their own volatile organic chemicals. By thinning existing vegetation, residual vegetation will be more efficient in taking up carbon dioxide from the area.

**Comment 17:**

*Removal of vegetation has changed the micro-climate of the area, causing increased electrical usage for air conditioning.*

**Response:**

The PTEIR/PTHP process will encourage landowners to be aware that large vegetation on the sunny side of a house in summer can reduce the overall heat reaching the house. That vegetation can be left as part of the fuel reduction plan while still achieving defensible fire protection goals by properly thinning out other vegetation. Each property must be managed differently, depending on the characteristics of the property and the owner's goals.

**Comment 18:**

*The PTEIR cites valley oak woodlands and riparian communities as being the most impacted by the proposed program. How will all oak species be protected, and how will oaks be reestablished. Will any effort be made to collect seeds from trees to be removed?*

**Response:**

The PTEIR does not identify valley oak woodlands or riparian communities as being the most impacted by the proposed program. It does identify them as vegetation types that the Meadow Vista Community Plan seeks to preserve and perpetuate. Towards those ends, valley oak areas will be identified and retention encouraged by individual landowners. Residual vegetation will favor valley oaks where they currently exist. All oak species occurring within Meadow Vista will be perpetuated by the PTEIR/PTHP process because vegetation is only to be thinned to reduce densities, not to be totally removed. Oaks are an abundant tree in the area and will continue to be. There are no proposals to reestablish oaks after thinning.

No operations, including heavy equipment, will occur in riparian communities except to remove hazard trees.

Most vegetation to be removed will be intermediate and suppressed sized trees which have little seed producing capacity and are generally of poorer quality than larger trees. Some larger dominant or co-dominant trees could be removed, but because there are many thousands of trees within the area of the same species, there is no need to preserve the seeds of just a few of them.

**Comment 19:**

*Fuel reduction is removing the wildlife safety zones along the "edges" where open space meets the forest. As the Plan is to protect the environment from wildfires, recognize that removal of a plant species from an area will relocate the inhabitants.*

**Response:**

There are no proposals to remove wildlife safety zones or to completely remove a plant species from an area. See response to comment no. 6, page 28, from Patrice Taylor.

**Comment 20:**

*What became of the idea to have a chipper "visit" neighborhoods to help reduce transportation off-site? Is there assistance for older residences to help insulate their homes to be cooler in the summer? There will be a potential for water shortages if we all get busy irrigating our new fire safe landscaping.*

**Response:**

The vegetation management project encourages chipping as a first priority for vegetation removal. The Placer County Fire Department, under contract to CDF for fire protection

services, is currently managing a chipper program. The program is voluntary and landowners that thin vegetation are asked to place the slash and debris near a public road so that the chipper crew can chip the vegetation and return the chips to the property as mulch. Residents in Meadow Vista, Alta, Christian Valley, Auburn, Lincoln, Colfax, and Foresthill have taken advantage of this program.

In reference to the need for additional insulation, see response to comment no. 17, page 32, by Patrice Taylor.

In reference to the need for additional water, see response to comment no. 14, page 31 by Patrice Taylor.

**Comment 21:**

*Removal of biomass can deplete soils of potential nutrients. Also burning can deplete potential soil nutrients.*

**Response:**

In most areas, slash and debris will be chipped and blown back onto the ground to naturally decompose and help hold the soil. In a few cases, chips and debris will have to be hauled away because of the volume of vegetation removed. However, most of a tree's nutrients are in its leaves and small branches. These will naturally fall after the projects are completed and will add to the soil as they decompose. Because of previous removals, general leaf fall will not create large amounts of additional fuels.

**Comment 22:**

The use of pesticides and herbicides during the initial phase and during the maintenance of the Plan has to be addressed.

**Response:**

See response to comment no. 12, page 30, by Patrice Taylor.

**Comment 23:**

*Will a greater bio-hazard from oil-laden water spray from automobiles running on wet roads occur when the amount of vegetation it gets sprayed on is reduced? Residents adjacent to shaded fuelbreaks may be exposed to increased levels of traffic related pollutants, after vegetation is thinned.*

**Response:**

Whether oil-laden water gets sprayed on vegetation or directly onto the soil, it can be considered a bio-hazard. This project will not impact the amount of oil-laden water that gets washed or sprayed off of paved road surfaces. Although most homes are set back a considerable distance from the road, residents may want to maintain a screen of vegetation between their houses and public roads at the time they agree to do a shaded fuelbreak on the their property.

Any increase in potential pollution reaching homes adjacent to roadways must be considered minor, as only portions of vegetation will be removed.

**Comment 24:**

*An increase in actual local fire suppression teams may be needed.*

**Response:**

A system of defensible space and shaded fuelbreaks will potentially allow a quicker extinguishing of fires, allowing firefighters to be more efficient and better utilize their time and resources. For larger fires, it is anticipated that firefighters would be able to suppress them before they become firestorms requiring much more manpower and equipment to fight.

**Comment 25:**

*The phones and code enforcers of Air Quality will be busy monitoring the effects of all the burning -- both legal and illegal.*

**Response:**

See response to comment no. 7, page 20, from the Placer County Planning Department letter.

**Comment 26:**

*Are PG&E's 20+ foot brush free powerline corridors part of the fuelbreak plan?*

**Response:**

These limited clearance corridors are designed to prevent fires started by the powerlines and are not generally part of the overall defensive plan to fight area fires. Such corridors, however, are a worthwhile fire protection measure and could be incorporated into the shaded fuelbreak system where appropriate.

**Comment 27:**

*There will be increased demand from existing water customers to irrigate replanting of vegetative screening along roads and maintain all fire-safe landscaping.*

**Response:**

See response to comment no. 14, page 31, from Patrice Taylor.

**Comment 28:**

*Who oversees plan development, implementation, and follow-up of projects under the PTEIR/PTHP? The Winchester project has a 75' vegetation buffer zone required along Placer Hills Road and Sugar Pine Road. How does this dovetail with the shaded fuelbreaks along ridges and routes?*

**Response:**

A Registered Professional Forester must write any program timber harvest plan (PTHP) associated with the PTEIR. The PTHP is based on the individual characteristics of the property it covers. CDF is the lead agency in reviewing the PTHP, assisted by other resource professionals, to make sure the plan is in conformance with the PTEIR. CDF is also empowered with enforcement and inspection responsibilities to make sure the plan is carried out on the ground, according to the PTHP. It is the responsibility of individual landowners for maintenance of defensible fire protection zones.

According to Winchester's Fuel Management Plan, as approved by CDF and Placer County, a system of shaded fuelbreaks is to be installed where the subdivision abuts public roads. This includes Sugar Pine Road and Placer Hills Road. Within these areas, existing vegetation will be managed and thinned, just as shaded fuelbreaks proposed under the PTEIR will be. There is to be no revegetation after thinning.

**Comment 29:**

*Who will assist in a more thorough survey of archaeological resources in the area?*

**Response:**

As part of every PTHP, an archaeological survey must be prepared by either a professional archaeologist or a trained individual acceptable to CDF. According to Forest Practice Rules, any potentially significant site must be protected by avoiding the site.

**Issues from the July 8, 1999 Public Hearing on the Draft PTEIR**

**Comment 1:**

*Potential abuse of "Plan" such as a landowner that cuts down trees for profit.*

**Response:**

Please see response to comment no. 1, page 16, from the Placer County Planning Department.

**Comment 2:**

*Need for a graphic presentation for the unsophisticated landowner to assist the landowner in making informed decisions.*

**Response:**

There will be a continuing public information program by the Placer Hills Fire District and the Fire Safe Council established for Meadow Vista. Landowners will be made aware of their options, including the PTEIR/PTHP process.

**Comment 3:**

*Concern that the "Plan" will make it easier and less expensive for the sale of timber on private land.*

**Response:**

See response to comment no. 1, page 16, from Placer County Planning Department.

**Comment 4:**

*The PTEIR picked up where the "General Plan" left off in regards to listed species and archaeological resources as the program's review identifies such resources.*

**Response:**

It was not within the scope of the PTEIR to survey nearly 7,000 acres for biological and archaeological resources. The PTEIR/PTHP process, however, requires identification of biological and archaeological resources for each proposed parcel including protective measures for such resources.

**Comment 5:**

*Need clarification if there is a difference in terms "vegetation management" and "fuel load reduction."*

**Response:**

The two terms are interchangeable and refer to the types of silvicultural practices discussed in the document to provide defensible space and shaded fuelbreaks.

**Comment 6:**

*What would the impact be to Meadow Vista if this program were implemented on the largest scale possible? How would it impact habitat and what would the ramifications be for wildlife?*

**Response:**

See response to comment no. 6, page 28, from Patrice Taylor letter.

**Comment 7:**

*The program does not require the maintenance of fuel load reduction after the initial effort.*

**Response:**

Maintenance would be responsibility of the landowner. It may also be possible that the Placer Hills Fire District or CDF would provide maintenance in some fuelbreak areas.

**Comment 8:**

*Is implementation structured on a time frame or is it self limiting in some way?*



**Response:**

The program is voluntary and will be implemented only at the rate and to the extent that landowners choose to apply it. It is highly likely that the actual level of implementation—and hence the level of fuel reduction and change to existing conditions—will be significantly less than the full implementation scenario analyzed in the PTEIR impact assessment.

The requirements for defensible space around structures and the shaded fuelbreak system will continue to be enforced and encouraged by the Placer Hills Fire District and CDF. The PTEIR/PTHP process will be only one of several tools available to property owners to implement these programs.

**Comment 9:**

*Chipper program's limited use to roads and driveways and not off road creates a burden for the landowner to move slash and debris to the chipper.*

**Response:**

The use of a licensed timber operator provides equipment to move debris to the road to access chipper or to use chippers which are not a part of the current program. As the use of chippers becomes more common, the current program may be expanded to serve interior properties.

**Comment: 10**

*Need to address the problem of invasive species, such as star thistle, taking over in the absence of vegetation that is removed in fuel load reduction efforts.*

**Response:**

The areas where vegetation has been removed are subject to re-invasion by both native and non-native plant species. This can occur either through the re-sprouting of cut vegetation, the germination of dormant seed in the soil, and the introduction of seed from offsite. Treated areas will require periodic maintenance by the landowner to ensure their continued function as fuel breaks. Maintenance may involve mechanical (mowing, hand cutting), chemical (herbicide), or cultural (burning, mulching) control practices. In general, regular maintenance will serve to keep invasive species, such as star thistle and scotch broom, under control while at the same time preventing the buildup of native species. On

occasion, invasive species may become a problem between regular maintenance and require special attention. It is suggested that the landowner contact the local Agricultural Commissioner or pest control advisor for recommendations on alternative treatments.

**Appendix "A"**

**Comment Letters**

**Issues from 7/8/99 Public Hearing**

**Attachment "B"**

**Final Meadow Vista PTERI/PTHP Checklist**